

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

In Re TERRORIST ATTACKS on)
SEPTEMBER 11, 2001)
)
03 MDL 1570 (RCC)
ECF Case

This document relates to:

Federal Ins. Co. v. Al Qaida, 03 CV 6978 (RCC)
Kathleen Ashton v. Al Qaeda Islamic Army, 02 CV 6977 (RCC)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, pursuant to the Stipulation and Order endorsed by the Court on July 22, 2004, and upon the accompanying Consolidated Memorandum of Law in Support of Motion to Dismiss of Defendants SNCB Corporate Finance Ltd. and SNCB Securities Ltd. (collectively, “the SNCB English companies”), upon the Affidavit of Mitchell R. Berger dated August 26, 2004, upon all exhibits annexed thereto, and upon the First Amended Complaint in *Federal Insurance* and the Fourth Amended Consolidated Master Complaint in *Ashton* filed in these actions, the SNCB English companies shall seek an order dismissing with prejudice all claims against them for lack of personal jurisdiction (FRCP 12(b)(2)) and failure to state a claim upon which relief may be granted (FRCP 12(b)(6)).

Dated: August 30, 2004
Washington, D.C.

Respectfully submitted,

/s/ Ronald S. Liebman
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